MERCER RANCH
QUALITY WASHINGTON GROWN VEGETABLES
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To;
Ms. Carmelita White
Registration Branch III (7508C)
Office of Pesticide Programs
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave.
Washington, DC. 20460

7/1/00

From;
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Mercer Ranch
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Regarding;
Vydate

We farm South of Prosser, WA. and in Hermiston , OR. The farm primarily consists of center pivot irrigation systems with a small amount of sold set sprinklers and an occasional field of drip irrigation. Our standard circle size is 125 acres. Our soils are sandy with a few areas of silty sand. When we lease farm ground that has a higher silt and clay content, we must increase our Vydate rate per acre to experience the same efficacy for nematodes etc. This will also happen in other production areas. We farm sweet corn, peas, garlic seed, carrots, potatoes, onions, kale, grass seed, and lettuce. We use Vydate in our carrots, onions, garlic, and potato crops for various pest problems. This is the crop breakdown of our Vydate use.

Carrots; We apply ½ gallon of Vydate per treated acre, to control seed corn maggots and to suppress root knot nematodes at planting. For further nematode control, 1 to 2 more applications of ½ gallon are necessary for control. The band application is made by ground immediately after planting and incorporated by irrigation water. The succeeding applications are water run with ¼ to ½ acre inch of water. The post plant pre emergence application of Vydate is done with a cultivator. The cultivator travels at 2.0 mph and covers a maximum of 45 acres per day. The tractor operator will mix 45 acres of Vydate

per day. In the last 3 years, we have mixed and applied a maximum of 150 acres of water run Vydate in one day. Alternatives; Vydate is the only product available for nematode control after we plant. Telone II can be used pre plant but we see failures where we have wet ground. To date; Vydate used in the band application after planting, has proven to be effective. Vydate has more beneficial insect recovery than other insecticide products used in carrots.

Onions; Occasionally we experience stubby root and lesion nematode damage in our onions. The nematodes will produce economic damage from the 3 true leaf stage and later. We will apply Vydate at ½ gallon per acre, water run, two times. This split application works very well, particularly for the J2 stage that was not susceptible during the first application. We also see excellent control of thrips. All of the Vydate used in our onions has been water run applied. The maximum that we have loaded and applied, in our onions, has been 170 acres in one day, (7 year history). Alternatives; A pre plant application of Telone II. This is not a good practice to fumigate if you think you will not have a problem. This becomes an insurance application, which may be unnecessary.

Garlic; Garlic is reproduced by plant parts. We take the whole clove, break it into smaller pieces, and then plant these pieces. Washington, Oregon, and California, each have garlic seed inspection programs to prevent the movement of diseased and nematode infested seed from one area to another. This is not a perfect program. Some years we find our imported seed stock has Stem and Bulb nematode infections. This seed has been inspected but had trace amounts of nematodes invisible to the inspectors. We make two applications of ½ gallon per acre each to take care of this problem. We have mixed and applied a maximum of 125 acres per day via the irrigation system, (5 year history). For every acre we can control at the seed production level, there is approximately 10 acres that will not need to be treated when the seed is shipped to the final growing site before it enters the marketplace. This assumes that the next planting will be in non-infested soils. Alternatives; None. Vydate is the only in ground control measure we have.

Potatoes; Telone II will not control high counts of nematodes. We rely on Vydate to help us bring our soil counts down to an acceptable level. We have used ½ gallon three weeks after planting and another ½ gallon six weeks after planting with good success. We also see good suppression of aphid, and Colorado potato beetle. Spiders are our main predators in our potatoes. Lacewing, big eye bug, minute pirate bug, and ladybird beetles round out the other important predators. We see excellent recovery of our major insect predators compared to Furadan or Temik. The most we have mixed and applied in one day has been 250 acres, (3 year history). We had 250 acres of water run, 1999, and 250 acres by a ground custom operator, 1998. All of our Vydate used in the potatoes has been water run except for the occasional ground application. Once the seed is in the ground, there are no products available to control nematodes other than Vydate. We also see good control of aphids with 1 quart water run every three or so weeks. There are many other aphid products registered in potatoes.

Additional notes;

We prefer to chemigate Vydate when ever possible. Ground application is next and the least preferred is air application. We have had no Vydate applied by air on this farm.

If at all possible, we would like to keep the current crop labels and label use rates.

Our beneficial insect pest management has been improved by the selective use of Vydate.

Ag Northwest is a major air applicator in our farming area. Ag Northwest applies approximately 50% of the pesticides used in the vegetable production areas of Umatilla and Morrow counties of Oregon. We Farm along the breaks of the Columbia River in the State of Washington. Ag NW also services our farm as well as the farms to the East of us also along the Columbia River. These would be the Southern portions of Klickitat, and Benton Counties. Their market share is slightly high here at about 55%. Enclosed are their Vydate air application records for the last 2 years.

We do not use the same people to mix and apply our Vydate listed in the various above crops. Each production team is responsible for the application of products to their crop. We can mix a load in a chemigator in about 25 minutes. This also includes rinse time and cleanup.

Please call or E-mail me if you have any questions.

Regards,

Todd Crosby

Cc; Charles Bayer DuPont

enclosures

FAX COVER SHEET

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DATE: June 23, 2000

TO: Todd Crosby - Mercer

FROM: Ted Pesicka -- AG Northwest

SUBJECT: Vydate Applications & Closed Mixing Procedures

PAGES: 3 (including cover sheet)

REMARKS: ☐ URGENT ☐ FOR YOUR REVIEW ☐ REPLY ASAP ☐ PLEASE COMMENT

Loading Procedure for Closed Mixing System

Example Load:

2 # Dithane DF per acre

2 Pints Monitor 2 per acre

1. The Monitor 4L is in a 15 gallon or 30 gallon U-turn container with a dry brake fitting.
2. The dry brake is connected to a one inch hose to pump system.
3. The Dithane DF is then mixed in the agitation tank; a loading hose is attached to aircraft.
4. The inlet port of pump mainifold is opened, and monitor is drawn into pump system and pumped directly into aircraft hopper.
5. When the appropriate amount of monitor is on board, the dry brake is disconnected and placed in a five-gallon bucket of water to clear inlet hose.
6. When inlet hose is clear the Aux inlet valve is closed and main valve from tank is opened and Dithane is pumped on board the aircraft.
7. The tank is then rinsed and balance of hopper is filled with clean water.

In using this type of system, Monitor 4 is never in an open tank. Protecting the loader and the pilot.

1998 & 1999 Vydate L Application

One application made June 21st, 1999

One Pilot & One Loader did 167 Acres

Pilot:1 167 Acres

Loader:1 167 Acres

2 year totals for 5 planes and 9 loaders.